

**Proposed Agenda (Revised 3/15/00)****VASQUEZ/I-70 WORKING GROUP MEETING**

Thursday, Thursday, March 16, 1999, 8:30 AM to 1:00 PM

SWANSEA RECREATION CENTER2959 East 49th Avenue, Denver CO**Goals and Expectations for the Meeting – Facilitators****Environmental Justice Discussion – Liz Evans (lead)**

- Presentation by EPA
- Community concerns and ideas
- Discussion

Community Issues – Mel Muñoz (lead)**ATSDR Activities – Susan Muza**

- Status of Public Health Assessment
- Health Team Meeting topics – March 21

State Lead Poisoning Prevention Group – Terry Taylor (State) and Gene Hook (City)**Phase III Data – Bonnie Lavelle**

- Summary of Technical discussion 3/10
- Questions – Process for addressing these questions
- Update on release of Phase III data on public property

Update on Phase III Removal Homes – Bonnie Lavelle**Status of Risk Assessment – Bonnie Lavelle****Update on Community Involvement – Ted Fellman****Next steps**

- Finalize February 24 meeting summary
- Next meetings: April 20 – 8:30 to 1:00
June 1 – 8:30 to 3:00 [proposed]

Meeting evaluation*March
Packet**There was
also a booklet
(bound)
from EPA*

00 MAY 11 PM 3:11
EPA, REGION VIII
SUPERFUND BRANCH

**VASQUEZ BOULEVARD/INTERSTATE 70 SITE
WORKING GROUP MEETING
FINAL MEETING SUMMARY
March 16, 2000
Swansea Recreation Center**

In attendance:

Working Group

Lorraine Granado, Cross-Community Coalition
Michael Maes, Elyria neighborhood
Laurel Mattrey, Copeen
Celia VanDerLoop, City and County of Denver, Department of Environmental Health
Robert Litle, Asarco
Anthony Thomas, Clayton neighborhood
Susan Muza, ATSDR
Mel Muñoz, Copeen
Bonnie Lavelle, EPA Region 8
Chris Weis, EPA Region 8
Jane Mitchell, Colorado Department of Public Health and Environment
Linda Larson, Heller Ehrman (for Asarco)

Others

Ted Fellman, EPA Region 8
Elizabeth Evans, EPA Region 8
Michael Wenstrom, EPA Region 8
Gene Hook, City and County of Denver, Department of Environmental Health
Julia Korndorfer, Colorado Department of Public Health and Environment
Pat Courtney, EPA
Joyce Tsuji, Exponent (for Asarco)
David Folkes, Enviro Group (for Asarco)
Mark Rudolph, Colorado Department of Public Health and Environment
Terry Taylor, Colorado Lead Poisoning Prevent Program
Chris Arend, Congresswoman Degette's office
Marc Herman, EPA – Project Manager for Argo and Omaha Grant Smelter sites
Fonda Apostolopoulos, Colorado Department of Public Health and Environment

Facilitators

Mary Margaret Golten, CDR Associates
Louise Smart, CDR Associates

Anthony Thomas announced that Joan Hooker will be having open heart surgery on Tuesday, March 21 at the Kansas Heart Hospital in Wichita, Kansas (1-800-KSHEART, 316/630-5100, 316/630-5000, 3601 N. Webb Road, Wichita KS 67222). Her current

phone number in Kansas is 316-365-2939. The group contributed money to send her flowers.

Goals and Expectations

The facilitators asked the Working Group to let them know if there were any needs (for breaks, opening windows, spending more time on an issue, etc.) they should address to make this a better and enjoyable meeting. They asked the group to work from the assumption that everyone at the meeting was there because they cared about the well-being of the VB/I-70 community and wanted to work together, each in their own way, toward making VB/I-70 a healthier, safer place to live. Further, the facilitators agreed with the group that it is often important to slow down the pace of the dialogue to assure that each issue is fully discussed.

Environmental Justice: How it fits into the VB/I-70 Process

Liz Evans of EPA made a presentation on behalf of the EPA VB/I-70 Team (the EPA staff working on the VB/I-70 site, including Bonnie Lavelle, Matt Cohn, Ted Fellman, Michael Wenstrom, Chris Weis, Marc Herman, and herself). She said the EPA philosophy is that environmental justice must be an integral part of EPA programs, integrated into EPA's air, water, waste, and Superfund programs. Environmental Justice is not a separate program. Environmental Justice staff participate in internal advocacy and education on environmental justice—through course correction, consultation, and coaching to help the programs integrate environmental justice into their programs.

1. How has environmental justice been integrated into the VB/I-70 site by the EPA team working on this project?
 - a. Getting management involved (going up the line at EPA Region 8 and into Headquarters)
 - b. Dedicating Environmental Justice staff to this project (Michael Wenstrom, who spends 40-50% of his time on VB/I-70)
 - c. By holding meetings with community groups as well as making personal contacts, working to understand the needs of the community, with a feedback loop to Bonnie Lavelle as Project Manager
 - d. Outreach in Spanish and communication with Spanish media
 - e. Expediting the NPL listing and making sure the community was involved and knew what was going on at the NPL listing stage
 - f. Setting up the VB/I-70 Working Group (Bonnie explained that they had determined during the listing that it was crucial that the community be involved and decided to create a formal process to give the community access to the discussions that EPA, the State, and the City normally have, to let the community be "a part of Project Management." This required a commitment by the State and the City that they would not have the special relationship with EPA that they would normally have, including private meetings with EPA.)

- g. Help with the TAG grant. The community acknowledged the effort that Ted Fellman and Michael Wenstrom had made on the TAG grant application process. However, they expressed frustration that the EPA TAG office has made the process difficult and has delayed the TAG grant. The community has had to re-write the TAG application four times and is still without technical assistance.
- h. Presenting a six-hour Environmental Justice Workshop for the Working Group. This was the first time EPA had taken this workshop to a community. (It is typically conducted for government staff.)
- i. Gaining the assistance of the community in obtaining access to properties, which has enabled EPA to get site access in a more user-friendly way.
- j. Exploring incorporation of environmental justice into standard setting. Michael Wenstrom asked other EPA regions how they incorporate environmental justice into the cleanup standards. He found there are no guidelines other than listening to the community and being creative around their needs. Bonnie said that incorporation of environmental justice into cleanup standards will emerge as the project matures through the summer, as EPA will be considering how environmental justice fits into the decisions on what action to take at the site. The specifics of the communities' concerns and issues were built into the Risk Assessment assumptions, especially in defining the exposure pathways.

Lorraine Granado expressed appreciation for EPA's open process and responsiveness to community concerns about sampling.

2. The Big Picture in North Denver – what is happening in North Denver, beyond the Superfund work
 - a. The Sand Creek initiative (begun six-seven years ago). EPA and the State formed a partnership and inspected all the regulated facilities in the Sand Creek area.
 - b. Grant activity. Almost \$750,000 in grants have been made to North Denver, including:
 - Environmental Justice small grants (9)
 - Environmental Justice Pollution Prevention Grants (4)
 - Regional Geographic Initiative grant
 - Grant to Northeast Denver Pollution Prevention Alliance to work with small businesses
 - c. ATSDR involvement with the community's public health questions (Susan Muza: ATSDR always perceives the community as an integral part of ATSDR actions. Superfund listing creates mandatory participation by ATSDR.)
 - d. COPEEN's toxic tour to EPA's enforcement managers: As a result, EPA assigned a person (Brenda South) for six months to focus on the use of EPA enforcement authority in North Denver. (Matt Cohn was an advocate for this.) In addition, EPA has formed a partnership with the State on how to use their

collective enforcement authorities to reduce pollution in North Denver. (Michael Wenstrom has a copy of the State/EPA agreement.)

- e. The State and City are conducting blood-lead testing (see notes below on presentation by Terry Taylor).

Ted Fellman acknowledged that EPA's specific mission through the Superfund project at VB/I-70 is soil cleanup. At the same time, EPA recognizes environmental concerns about other issues. EPA is committed to help initiate and coordinate other resources to meet the larger environmental concerns.

Celia VanDerLoop reported that the City is doing cumulative risk modeling (air), based on stationary sources. The City's zoning ordinance allows the City to consider cumulative effects of existing sources when reviewing applications for a new or expanded source. Where cumulative risk levels are high, additional pollution control devices could be required, or other alterations in plans to reduce emissions.

- 3. What will be done at the site in the future, in terms of Environmental Justice? EPA asked the community for input. The community distributed a paper describing their ideas regarding how to apply environmental justice at this site and discussed these ideas:
 - a. Inhalation. Lorraine Granado expressed concern that inhalation is not being considered as a pathway of exposure. Bonnie Lavelle explained that EPA is looking at inhalation of particulates from the yards. In the VB/I-70 site Risk Assessment for the residential soils, EPA is looking at how re-suspended dust from the yard is breathed in. EPA is looking at ingestion, dermal exposure, and exposure through inhalation. Chris Weis is attempting to analyze this exposure mathematically in the Risk Assessment. Currently, EPA is assuming that exposure through inhalation is minor. Lorraine Granado said that re-suspended dust comes from semi-trucks, unpaved alleys, and yards without lawns. Children playing, skate-boarding, and roller-blading in the alleys will be exposed to this dust. The community wants to know: where the dust is coming from and what is in it. Bonnie said that the Risk Assessment will address alleys, although EPA did not find dirt alleys near yards where there were high concentrations. She agreed to look again at alleys in the re-sampling of Phase 1 and Phase 2 data this summer.
 - b. Ambient air monitoring. The community is eager for CDOT to begin providing data from its ambient air monitoring, to help identify whether there is arsenic that is being re-suspended in the air. Joyce Tsuji suggested that there is time in the Risk Assessment timeline to look at the CDOT information and integrate this into the Risk Assessment. Bonnie said the EPA can look at total suspended particulates (from the CDOT data) and assess whether the assumptions in the Risk Assessment are conservative enough. The community is continuing to request air monitoring in the VB/I-70 site. Bonnie said that she is considering the possibility of including the recognition of uncertainties in her evaluation of the area as a Superfund site. The remedial actions listed in the ROD may be an opportunity to address these uncertainties. It is a requirement that the ROD be

implemented once it has been signed. Susan Muza noted that the Public Health Assessment can help through its health recommendations, although it has no implementation requirement. Bonnie said that the recommendations of a Public Health action plan can provide EPA with additional justification for its actions.

- c. Level of cleanup. EPA typically uses a range of 10^{-4} to 10^{-5} . The community wants to use the factor of 10^{-6} . Because this is an environmental justice community, the community believes there is justification for the 10^{-6} level to reduce the cumulative larger risk. The community is willing to work with the EPA team to help influence EPA decision makers to accept this cleanup level. Bonnie Lavelle asked that the community remain open about the final cleanup decision. She said that cleanup of more yards may not be the best action that can be taken to make this the healthiest community it can be. She said the appropriate cleanup action will not be clear until there has been an examination of the doses and the concentrations, and she encouraged everyone to remain flexible about the final decision. Lorraine explained that 10^{-6} relates to benzene and sulfur dioxide and said that the community will stay open to changing their minds until the final data are collected.
- d. Recognition that environmental justice is about finding solutions to end environmental racism: Mel Muñoz referred to misleading statements in an article on Milford Fryer and pointed out that environmental justice targets low-income white communities as well as minority communities.
- e. Continuing conscious incorporation of environmental justice in the VB/I-70 work by the Working Group: Mel acknowledged, for the community, the efforts that have occurred, including Bonnie's work with the Working Group and the caring attitudes of staff within the agencies and within the community. The community also recognizes that this Working Group process is very different from what typically occurs at other Superfund sites. *And*, she emphasized, there is a continuing need to have the environmental justice issue considered at all Working Group meetings, to continuously improve on the quality of our work. She said that all members of the Working Group (community members, EPA, the State, the City, and Asarco) can keep reminding each other that this is an environmental justice community and help us think together about environmental justice implications.
- f. Development of a model that can be used at other sites: Lorraine Granado, Laurel Mattrey, and Mel Muñoz suggested that the approach taken through the Working Group be documented so that it may serve as a model for other projects. The inclusion of the community has been exemplary. The VB/I-70 project can demonstrate how environmental justice has been incorporated in a meaningful way at this site, as a model to help others in the country who are experiencing similar problems. Going slower, to address the tricky technical issues, has been critical. Slower may actually be faster, because this process may be expedited by avoiding a lot of antagonism. This model can debunk the myth that if you involve the community you will have a longer process. In fact, if the community is not involved in a meaningful way, the process can take much longer. It will be useful to capture "lessons learned" on the project and to take

advantage of this opportunity to educate other EPA regions and other agencies. Laurel suggested that the Working Group develop an action plan around how to make this a model.

- g. Official recognition of this community as an environmental justice community: Laurel Mattrey made the suggestion (on behalf of the community) that VB/I-70 be named an "environmental justice zone." To the community this means that there is official recognition that this community has a saturation of undesirable uses and that there are cumulative and synergistic effects on people of color. They want the EPA documents to acknowledge that this is an environmental justice community. They also want the ROD to state how environmental justice was addressed at this site. The word "zone" is not important in itself; it implies the VB/I-70 boundaries.
- h. Desire for a comprehensive health study. The community said that they want a comprehensive health study, *with scientific credibility*, that documents health problems and the incidence of illnesses in the VB/I-70 community. This could relate to the uncertainties that will be mentioned in the ROD. Anthony Thomas described an "illness assessment questionnaire" that a citizen had distributed at the EPA risk communication conference. Michael Wenstrom will make copies and bring them to the next Working Group meeting.

The Working Group agreed that:

- 1. Whenever they are dealing with an issue, they will raise the question of how environmental justice relates to it, and
- 2. Every three to six months, the Working Group will do a big-picture check on how well they are doing in terms of environmental justice awareness.

CDPHE Lead Poisoning Prevention Program

Terry Taylor, the Program Manager for the CDPHE Lead Poisoning Prevention Program, presented information to the Working Group on that program.

In 1994, CDPHE received grants from the Center for Disease Control and EPA to determine how big a problem lead poisoning is in Colorado. (Pediatricians do not typically believe that it is a problem.) The statewide prevalence of elevated blood leads in children is 3.2%. It is now mandated that all one- and two-year-old children on Medicaid have their blood tested for lead. The northeast Denver lead survey (1995) showed that 16.2% of children (165 were tested, out of 300 eligible) had elevated blood leads (over 10 mcg/dL). Northeast Denver Housing Center, through the city of Denver's Community Development Agency, obtained HUD funding for renovation and remediation of homes with lead hazards.

In August 1999, EPA gave the Lead Poisoning Prevention Program an environmental protection grant to conduct community outreach and education in northeast Denver. The LPPP is partnering with the Northeast Denver Housing Center and would like to expand its work to the VB/I-70 site. This could include: sample surveying of one- and two-year

olds in the area, training community members on correct cleaning practices when lead is present in the home, and lending of a HEPA VAC (high efficiency particulate air vacuum). ATSDR and the state blood-lead program will need to coordinate their testing programs.

The community said it is critical that families not be approached multiple times for testing. When the LPPP is ready to conduct a blood-lead survey in the VB/I-70 area, it will be helpful to have other community organizations assist through promotion of this effort. The community suggested this be done through the newsletters for Swansea, Elyria, Globeville, and Clayton. The LPPP could offer the testing by sending a postcard to every known address, telling the residents where LPPP will be conducting the testing. Or the LPPP can go door-to-door conducting on-the-spot testing with a hand-held analyzer. In either case, the survey would be a sample of one- to two-year olds.

After March/April 2000, the City (Gene Hook) will be conducting environmental evaluations to try to identify the source. Elevated blood lead cases should be referred to the City so that the City can respond in a timely fashion. Because of confidentiality, it would be up to the parent, not the City, to let EPA know of the source of the lead. Susan Muza said ATSDR would coordinate consent forms for ATSDR, EPA, and the City, that would indicate these three agencies would share data. Common lead sources include: lead in paint, lead solder, stained glass workers in the homes, bean pots from Mexico, and certain home remedies. Lead paint was banned in 1978, but until 1978 most house paint contained lead. So, typically there is lead in homes that were built before 1978. Concentrations of lead in the paint were higher in the 1940s. If a home was built before 1978, the residents should not dry-sand painted surfaces.

Terry Taylor's phone is (303) 692-2685. Pat Ennis (who speaks Spanish) can be reached at (303) 692-2789.

The State certifies people to conduct renovation and remodeling in homes where there is lead. The Northeast Denver Housing Center is looking for community members who would like to become certified in removal of lead hazard from homes. If a household that meets the income guidelines has a child with elevated blood-leads, the Northeast Denver Housing Center program can pay for removal of lead from the home.

Gene Hook, from the City of Denver Department of Environmental Health, said the City has a program in place to provide educational materials to homes with elevated levels of lead in dust.

Susan Muza said that ATSDR will test children (80) and adults (20) from homes with the highest concentrations of arsenic and will also make referrals for lead testing to the State LPPP. David Hewitt is drafting the protocol. It will be available at the March 21 Health Team meeting.

Lorraine Granado requested a statement about lead that parents could take to their physician. Terry Taylor said the State has mailed information on lead to all pediatricians and family practice physicians in Colorado. She said that the LPPP can also provide a written statement that residents can take to their physicians.

Next steps regarding lead: ATSDR will discuss the blood-lead issue at the Health Team meeting. Terry Taylor, Teresa NeSmith, and Julia Korndorfer will work together on an informational sheet for physicians.

Operable Unit 2

"Operable Unit 1" is focused on the residential soils. "Operable Unit 2" is focused on the two smelter locations (Argo and Omaha Grant) and will evaluate whether there are Potentially Responsible Parties (PRPs) associated with those smelter sites and will develop a conceptual site model for the ground water under the smelter sites. Asarco and the City have responded to an EPA request for information. Marc Herman is the EPA project manager for Operable Unit 2, and he plans to work with the Working Group to get input on how EPA will proceed with the investigation and how EPA will develop its conceptual site model. Marc's work will address "on-facility" soils.

PAX

Lorraine Granado requested an update on PAX. She said the community would like to know:

1. How much fertilizer a person would have to put in a yard to produce the kinds of arsenic concentrations found in this site?
2. At what rate would arsenic from fertilizer break down?

Bonnie Lavelle distributed the results of EPA's analysis of the type of arsenic, lead, zinc, and cadmium found in PAX (a four-year crabgrass pesticide) and said that an update on the PAX analysis would be provided at the April Working Group meeting.

Chris Weis's Activity

Chris Weis explained that, in November, he was called into an emergency response in Montana, that prevented him from attending several Working Group meetings. He said he has been very involved in the VB/I-70 Risk Assessment through communication with Bonnie and with contractors.

Bioavailability Study

Chris Weis explained that he has delayed the release of the pig study data. The dosing material was measured by two different techniques, XRF (Xray fluorescence) and ICP. He was not comfortable with the disparity between these measurements and took steps to resolve this discrepancy by measuring the dose through a third technique, "neutron activation." He said that the practical impacts on the study are not significant because

the study considers relative availability – how arsenic in the soils at the site is absorbed relative to freely soluble arsenic. He also explained that one of the researchers (from a midwestern university) presented the results in a public meeting without knowing that Chris had put the release of the study results on hold. The results are not yet final. The results will be available within a few weeks, perhaps by the next Working Group meeting. A final report will be written and summarized in the Risk Assessment.

Update on Phase 3 Removal Homes

EPA Region 8 management will request approval by EPA Headquarters for funds for these removals. Pete Stevenson is drafting an action memorandum describing what will be done. He will have a schedule for removals by the next Working Group meeting. Tilling will not be used as remediation on these removal properties. In addition, Pete agreed to consider attic dust and dust in crawl spaces. (He will make an evaluation, on a house-by-house basis, on whether it makes sense to test attic dust.)

Phase 3 Data – Release of Results

There have been calls asking about soil concentrations at daycare facilities and schools. Bonnie Lavelle will send an e-mail to the Working Group as soon as she has sent a letter with sampling results to the schools.

Bonnie said that EPA has provided addresses of Phase 3 properties and their testing results only to the State and to ATSDR, with whom EPA has confidentiality agreements. Celia VanDerLoop asked what exceptions the EPA was applying to the State Open Records Act and the Freedom of Information Act in not releasing the data to the public. Bonnie said that the Privacy Act provides such an exception. The EPA perceives the sampling data in the same way as personal medical information. She said the EPA is concerned that if the information is released to the City, it will then be released to the public.

She said EPA's concern about public release of the information stems from concerns expressed, early in the project, by property owners about impact on obtaining financing, on property values, and potential redlining. She noted that private property owners must give consent for their properties to be sampled and that only 60% of the property owners have allowed EPA to sample. EPA believes citizens are fearful of government and that keeping sampling results information private may help in getting more people to allow sampling.

EPA can tell anyone whether a given property was sampled and can direct the inquirer to the property owner for information on results. If a property owner cannot find the results, EPA can provide another copy.

The City's concerns are:

1. The City has some property interests in the area
2. The City thinks that people have a right to know about their neighbors' property

3. There are a lot of prospective purchasers who need to know about the status of property they may buy, and
4. The City would like to have a spatial feel for the data—how the high concentrations are distributed within the neighborhoods.

EPA is willing to enter into a confidentiality agreement with the City.

The community will check in with community members about their concerns about protecting confidentiality/releasing the data and will report back at the next Working Group meeting.

The Draft Risk Assessment, which will be available in the information repositories, will have summaries of the results of the sampling, the numbers of properties at certain concentrations, and the locations of properties that are above certain levels of concentrations. Bonnie said the Risk Assessment would include a spatial representation of the Phase 3 data.

Update on ATSDR activities

Susan Muza reported that the Public Health Assessment is on hold, pending the Pica Workshop (June 7 and 8). The Working Group asked that ATSDR consider holding the Pica Workshop in the Denver area, so that VB/I-70 people can attend. Susan Muza will carry this request to ATSDR. ATSDR hopes to have funds available to bring a limited number of community members to the workshop.

The next **Health Team Meeting** will be held on **Tuesday, March 21, from 2:30 to 4:30 at the Cross-Community Coalition office**. Topics will include: (a) bio-monitoring activity and (b) health promotion/intervention activities, including getting feedback from the community about this program.

Lorraine Granado expressed the hope that the Health Team can finish looking at risk related to cancer before April.

TAG Grant

The community said that it is very difficult for the community to not have their TAG consultant available to them at this critical time. They still have to go through the government procurement process which typically is lengthy. EPA will attempt to expedite this process.

Arsenic health Impacts

Joyce Tsuji has pictures of lesions resulting from arsenic poisoning, as well as other information on arsenic health impacts. She will provide this information at the next Working Group meeting.

Next Working Group Meetings

APRIL 20

JUNE 1

EPA anticipates that the Draft Risk Assessment will be distributed by mid-May. The Working Group can discuss it at the June 1 meeting. A public meeting may be helpful after the draft has been distributed.

At the next meeting, the facilitators will provide a long-term calendar proposal for future Working Group meetings.

Meeting evaluation

The positives:

- The environmental justice discussion
- People were clear, talked about what things *mean*, and what we can do.
- Renewal of where everyone is going
- Chris's presence

Suggestions for improvement:

- There was not enough time for discussion/questions with Chris. These questions arise during the meeting and the Working Group would like him to be present to address them when they come up.
- If Chris is not present, a list of questions should be made during discussion, which can then be given to him for response (second choice, not ideal—first choice is for Chris to attend the meetings).
- Have Bonnie Lavelle, David Mellard, and Chris Weis spend time together, especially discussing the toxicity evaluation.
- Bagels are preferred.
- More food, especially fruit plate, when the meeting will be long.

Handouts at this meeting

- EPA Grants to North Denver, 1992-1999
- EPA's analysis of the type of arsenic, lead, zinc, and cadmium found in PAX
- Community Memo of Environmental Justice Concerns
- *Environmental Justice Leaves Cloudy Haze Over Issues*, Milford Fryer

- *1998, 1999 and 2000 Colorado Environmental Performance Partnership Agreement (FY2000 Update)* between The Colorado Department of Public Health and Environment and The U.S. Environmental Protection Agency Region VIII
- *Lead in Your Home: A Parent's Reference Guide*, EPA

ACTION ITEMS FROM THE MARCH 16, 2000 WORKING GROUP MEETING

Who will do it?	Task or requested action	By when?
Michael Wenstrom	Copy and bring to April 20 Working Group meeting the "Illness Assessment Questionnaire"	4/20
Terry Taylor, Teresa NeSmith, Julia Korndorfer	Coordinate on an information letter that parents in VB/I-70 can give to pediatricians	
Working Group	Review how well environmental justice is being incorporated into the work at VB/I-70	in 3 months
EPA VB/I-70 team	Expedite the TAG grant	
Community	Discuss with other community members their concerns and needs regarding confidentiality or release of Phase 3 data	

Environmental Justice and VB-170

Community Address Regarding Environmental Justice Issues and the EPA Superfund Process

Community has expressed its desire to designate the VB0-170 Superfund Site as an Environmental Justice Zone. We would like our community recognized as an environmental justice zone in the Risk Assessment, the Feasibility Study and the Record of Decision. At this time, we would like to specify what an "Environmental Justice Zone" is and how actions can be taken to integrate this into the Superfund process.

The neighborhoods within the VB-170 Superfund Site are inundated with hazards to health and well being in our soils, water and air. The EPA investigation, to date, has identified two "contaminants of concern" in our soils. Within our neighborhoods, however, we believe there are many pollutants of concern that contribute to the cumulative daily assault on our health.

The Superfund process needs to consider and integrate in its mandate how the cumulative effects of VB-170's myriad pollution sources contribute to creating neighborhoods that are not safe for children to play in or healthy for families to live in. If the EPA's intent is to make our neighborhood a safe, clean and healthy place to live in, its concern has to extend beyond removing soils from yards.

The Environmental Protection Agency should not only recognize the VB-170 neighborhood site as an Environmental Justice Zone; but, the precedents for public involvement and input in the process, as set forward specifically from this site, should be institutionalized from this point forward. Community members should be included as key stakeholders in every part of the process, from testing to risk assessment to the record of decision; not inserted where site managers or EPA policy considers it appropriate.

The community recognizes the VB-170 site as an Environmental Justice Zone, and as such, are advocating a clean up level at 10^{-6} . This clean up level falls at the upper end of the scale for the EPA's clean up procedures. Additionally, community would like to see further investigation, studies, and action related to the VB-170 Site. Specifically, further investigation should take place regarding the sources of hazardous material pollution that falls below the Toxic Release Inventory standards, but that cumulatively affect human health in the community. These hazardous materials that fall below the range of the Toxic Release Inventory should be recognized as contributing to the overall burden to human health that the community faces.

The community also recommends that a comprehensive health study be initiated in the community to determine how people's health might be affected by contaminants in the air, water and soil. This study would take in to account how the cumulative effects of the many contaminants from the air, water and soil, as well as mobile source pollution, affects community members' short and long term health.